



INNOVATIVE PLANNING SOLUTIONS

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July 26th, 2023

Provincial Land Use Plans Branch
13th Floor, 777 Bay St.
Toronto, ON, M7A 2J3

Email: growthplanning@ontario.ca

Attention: To Whom it May Concern

Re: Request for Consideration: Provincial Planning Statement
ERO - 019-6813
1194 and 1224 Belle Aire Beach Road, Innisfil, ON

Please accept this submission as our formal comments and requests relative to the draft Provincial Policy Statement, 2023. We would like to thank you for providing this opportunity to comment on the Environmental Registry Posting (019-6813) regarding changes to the planning policy framework in Ontario.

We are writing on behalf our client DLR Holdings, owners of property known municipally as 1194 and 1224 Belle Aire Beach Road in the Town of Innisfil (the 'Subject Lands'). Comprised of two parcels with an area of approximately 52.84 ha (130.57 acres), with frontage on Belle Aire Beach Road and Reid Avenue (Figure 1). The Subject Lands are located 375 metres southeast of the intersection of the 6th Line and the Metrolinx rail line. A portion of the lands are located within the boundary of the Mobility Orbit Minister Zoning Order and the complete landholding is within the *Town of Innisfil Draft Secondary Plan – Innisfil Orbit Potential and Innovation Plan* and has been included in the Town's planning for the overall Orbit vision (Figure 2). The Subject Lands are not presently in a Settlement Area.

DLR Holdings has been an active participant in the County of Simcoe Municipal Comprehensive Review Process with active requests for the Subject Lands to be included in the settlement area for redevelopment as a residential housing community. The concept plan for the Subject Lands as seen in Figure 3 includes a range of residential housing options, green space, community facilities, and flood mitigation measures benefiting the adjacent community of Belle Ewart. This concept is consistent with *Town of Innisfil Draft Secondary Plan – Innisfil Orbit Potential and Innovation Plan* vision for the site.

FIGURE 1: LOCATION OF SUBJECT LANDS



| | | |
|--|---|---------------------|
| <p>LEGEND</p> <p> Subject Lands</p> | <p>Figure 1</p> <p>SUBJECT LANDS AERIAL</p> <p>Source: Simcoe County Maps, 2019.</p> | |
| | <p>Drawn By: KT</p> | <p>File: 17-677</p> |
| <p>IPS INNOVATIVE PLANNING SOLUTIONS <small>PLANNERS • PROJECT MANAGERS • LAND DEVELOPERS</small></p> | | |

FIGURE 2: DRAFT SECONDARY PLAN – SUBJECT LAND USE



LEGEND

- Subject Lands
- Residential Medium Density 2
- Residential Medium Density 1
- Residential High Density
- Neighbourhood Commercial Area
- Community Uses
- Parks & Open Space
- Natural Heritage Features
- Proposed Woodland

Figure 2
Subject Land Use

Source: Orbit Potential and Innovation Plan (OPIP) (2023)

Drawn By: DS

File: 17-677



FIGURE 3: SUBJECT SITE CONCEPT PLAN



LEGEND

Subject Lands

**Figure 3
Site Plan**

Source: IPS

Drawn By: DS

File: 17-677



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Our client DLR Holdings is in favour of the changes to policies outlined in the draft Provincial Policy Statement 2023 (Statement). Specifically, we are supportive of draft policies related to *settlement areas* outlined in the draft Statement allowing for *settlement area expansions* to take place at any time eliminating the *Municipal Comprehensive Review* process. This will assist municipalities in long term planning, maintaining a supply of lands for housing as outlined in the Statement, and ensuring efficient infrastructure and public facilities are available to support growth.

In the case of Innisfil, allowing for the expansion of *settlement areas* creates an opportunity for adoption and implementation of *Town of Innisfil Draft Secondary Plan – Innisfil Orbit Potential and Innovation Plan* in a reasonable development timeline. The current provincial planning policies prohibit the Town from advancing planning of the Orbit outside of the MZO area. This has led to a plan with a 50 year planning horizon. We know that Ontarians need homes now. Building new homes, as shown in our concept plan, creating opportunities for increased transit ridership and developing connections for existing residents to the Orbit need to take place immediately as part of a prosperous Ontario.

Draft policy 2.4.2.1 requires *large and fast-growing municipalities* to delineate the boundaries of *major transit station areas* on *higher order transit* corridors through a new official plan or official plan amendment adopted under section 26 of the *Planning Act*. The policy provides that the delineation shall define an area within a 500- to 800-metre radius of a transit station that maximizes the number of potential transit users that are within walking distance of the station.

The Statement's proposed *major transit station area* policies are mandatory for *large and fast-growing municipalities* and optional for other planning bodies. We recommend that the Statement be amended to include all *major transit station areas*, including Innisfil. Opportunities to walk, bike, and use other means of active transportation should be encouraged to access public transportation in all Ontario municipalities.

As noted, the Town of Innisfil is planning for the lands located within an 800m radius of the transit station through the *Town of Innisfil Draft Secondary Plan – Innisfil Orbit Potential and Innovation Plan*. The Town should be commended for its forward thinking approach an Ontario municipalities with *major transit station areas* ought to be directed through policy to plan in this manner.

Alternatively, if this is not the desire of the Province to amend the draft Statement, the Town of Innisfil could be treated as exception in the policy document. We offer, for ease of implementation of such a policy exception, the Province consider ordering the lands contained within the *Innisfil Orbit Potential and Innovation Plan* be included in the settlement boundary. This will maximize the number of potential transit users in Innisfil who are able to access the transit station by means of active transportation, create housing options for Ontarians and make efficient use of planned infrastructure improvements.

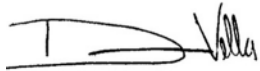
The addition of the Subject Lands in the *settlement area* is supportive of proposed policy 3.2.3 ensuring connectivity within and among transportation systems by providing existing residents with linkages to the Orbit Lands. Connectivity is crucial for new and existing residents to access the future GO transit station as well as the public service facilities and retail amenities that will be developed as part of the Orbit. The continuation of Webster Street (Figure 5) is a critical link for the municipality. Waiting until 2071 to connect the 5th and 6th of Innisfil on the west end of the town constitutes poor planning that will negatively impact the Orbit. This connection should be advanced immediately.

Inclusion of the Subject Lands in the *settlement area* in an expediated manner represents efficient land use planning and development. DLR Holdings supports the draft policies in the Statement, which if applied to the Subject Lands, will lead to the creation of housing options for Ontarians, support a *major transit station area*, protect natural heritage features, and create critical transportation infrastructure for the Town.

The concept, shown in Figure 4, is aligned with the vision set out in the draft Statement and will meet a full range of current and future provincial housing and infrastructure needs. We support the provincial direction and look forward to working with the province and the Town of Innisfil to build a prosperous Ontario.

Respectfully Submitted,

Innovative Planning Solutions

A handwritten signature in black ink, appearing to read 'D. Vella', written over a horizontal line.

Darren Vella, MCIP, RPP
President & Director of Planning